

12 CV 02700

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORKLlewellyn S. George

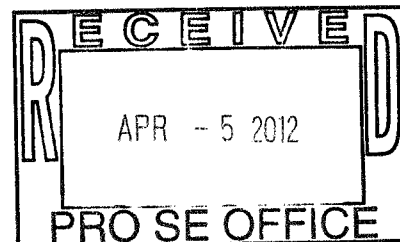
(In the space above enter the full name(s) of the plaintiff(s).)

-against-

John Rentoulis, Lisa Garcia,  
Carlos Collado, Drake Group, LLC

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

## COMPLAINT

Jury Trial: ☒ Yes ☐ No  
(check one)**I. Parties in this complaint:**

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff

Name Llewellyn S. GeorgeStreet Address P.O. Box-10County, City Westchester, ValhallaState & Zip Code New York, 10595Telephone Number (914) 231-1068

- B. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name John Rentoulis  
 Street Address 204 Martine Avenue, Inc., P.O. Box-330  
 County, City Westchester, White Plains  
 State & Zip Code New York, 10605  
 Telephone Number (914) 328-4105

Defendant No. 2 Name Lisa Garcia  
 Street Address 204 Martine Avenue  
 County, City Westchester White Plains  
 State & Zip Code New York, 10601  
 Telephone Number (914) 328-4105

Defendant No. 3 Name Carlos Collado  
 Street Address 204 Martine Avenue  
 County, City Westchester, White Plains  
 State & Zip Code New York, 10601  
 Telephone Number (914) 557-8388

Defendant No. 4 Name Drake Group, LLC  
 Street Address 204 Martine Avenue, Inc., P.O. Box-330  
 County, City Westchester, White Plains  
 State & Zip Code New York, 10601  
 Telephone Number (914) 328-4105

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

A. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Questions

☐ Diversity of Citizenship

B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? Plaintiff's First, Fifth and Fourteenth  
Amendment Rights, were violated by  
each of the defendants, also 42 U.S.C.A. § 3604(b).

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship \_\_\_\_\_

Defendant(s) state(s) of citizenship \_\_\_\_\_

**III. Statement of Claim:**

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? 204 Martine Avenue, White Plains, New York 10601

B. What date and approximate time did the events giving rise to your claim(s) occur? February 26, 2011, on or around 1:00 p.m.

C. Facts: Upon the above date, plaintiff was attacked and assaulted by a former tenant, Efram Burgos, who was deliberately misled, by Defendant Collado, Superintendent/maintenance at 204 Martine Avenue, into believing that plaintiff had stolen Mr. Burgos's property.  
Plaintiff was then assaulted by White Plains Police Officer Coyle #113-1726, along with being unlawfully arrested and falsely charged and prosecuted for criminal mischief, disorderly conduct and resisting arrest.  
Plaintiff was released from incarceration, seven months later, after all charges were dismissed by the White Plains City Court.

Continue

**IV. Injuries:**

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. Mental anguish, emotional distress, loss of income and housing.

Continued

Statement of Claim

plaintiff's one bedroom apartment at \$590.00 Five-hundred and ninety dollars per month, when in fact, \$1250.00 twelve-hundred and Fifty dollars per month, is what Defendants Rentoulis and Garcia were asking for.

On the 19<sup>th</sup> day of July, 2010, plaintiff paid Defendant Garcia \$6,250 six thousand-two hundred and Fifty dollars in advance, as well as in cash.

Yet, on the 29<sup>th</sup> day of October, 2010, Defendants Garcia and Rentoulis sent a Three-Day Rent Demand Notice to the Department of Social Service, falsely charging that plaintiff was indebted to Defendant Rentoulis, the landlord at 204 Martine Avenue, and Defendant Garcia, the broker/agent, for \$1870.00 eighteen-hundred and seventy dollars,

Continued

Statement of Claim

The incident was instigated by Defendant Collado, who was acting under orders from his employers, Defendants Rentoulis and Garcia, who were both seeking to evict plaintiff from his apartment, in retaliation to plaintiff's complaints about the following:

- 1, Around the first week of August, 2011, Defendants Garcia and Collado, knowingly sold bedbugs infested furniture.
- 2, Defendants Rentoulis and Garcia committed fraud, by doctoring plaintiff's lease agreement, to defraud plaintiff and the Department of Social Services, of a larger profit.  
Both defendants, deceptively valued

Continued

Statement of Claim

From September 1<sup>st</sup>, 2010 to November 1<sup>st</sup>, 2010.

3, Defendants Rentoulis, Garcia and Collado often shut off the heat and hotwater, in plaintiff's and other tenants apartments, on the weekends, during the months of November, 2010 to February, 2011, willfully exposing plaintiff and other tenants residing at 204 Martine Avenue, to extremely cold temperature.

Minutes after plaintiff was taken into police custody, Defendant Collado entered plaintiff's apartment illegally, by climbing up the fire escape, then sneaking through plaintiff's third floor bedroom window. Defendants Garcia and Collado, then disposed of plaintiff's entire personal property from his apartment, without his consent.

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Continue

Continued

Statement of Claim

Furthermore, Defendant Collado was fully aware of strong likelihood for a violent conflict, before he called Mr. Burgos, and deceived Mr. Burgos into believing that plaintiff had stolen Mr. Burgos's property.

On several occasions, Defendant Collado have bared witness to the threats that Efram Burgos had made against plaintiff. Once, in the presence of Defendant Garcia and two White Plains Police Officers.



**V. Relief:**

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation. Plaintiff is seeking \$15,000,000.00  
Fifteen million Dollars in punitive damages, and  
\$10,000,000.00 Ten million Dollars in compensatory  
damages

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 20<sup>th</sup> day of March, 2012.

Signature of Plaintiff

Llewellyn S. George

Mailing Address

P.O. Box-10

Valhalla, N.Y. 10595

Telephone Number

(914) 231-1068

Fax Number (if you have one)

**Note:** All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

**For Prisoners:**

I declare under penalty of perjury that on this 20<sup>th</sup> day of March, 2012, I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff:

Llewellyn S. George

Inmate Number

23624



Ruby J. Krajck  
Clerk of the Court  
United States District Court  
500 Pearl Street  
New York, NY 10007

March 20th, 2012

Dear Sir/Madam,

Enclosed for filing, please find one original, plus two copies of plaintiff's 42 U.S.C.A. § 1983 Complaint, and Application for In Forma Pauperis status.

Respectfully,

*Llewellyn S. George*  
Llewellyn S. George, #23624  
Plaintiff-ProSe  
P.O. Box-10  
Valhalla, NY 10595

CC: L. George

